

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

NATIN PAUL, WORLD CLASS §  
HOLDING COMPANY, LLC; and §  
WORLD CLASS HOLDINGS §  
MANAGEMENT, LLC, §

Plaintiffs,

V.

CIVIL ACTION NO. 1:21-CV-00954-LY

RANI A. SABBAN, Investigator, Texas §  
State Securities Board, in his individual §  
Capacity; PRESTON JOY, Special Agent, §  
Federal Bureau of Investigation, in his §  
individual capacity; DOES 1-40, Special §  
Agents, Federal Bureau of Investigation, in §  
their individual capacities; and DOES §  
41-100, Law Enforcement Officers, in their §  
individual capacities, §

Defendants.

**DEFENDANT RANI SABBAN'S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Rani Sabban files this Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiffs' Original Complaint.

As explained in the previous Unopposed Motion for Extension of Time to File Answer (Doc. #11) filed by the Department of Justice, the DOJ needed additional time to complete the representation process for Sabban. To allow for that time, this Court granted that unopposed motion and extended Sabban's answer deadline until "60 days after service of process on Defendant Joy." (Doc. #13).

Pursuant to that order, Sabban's current answer deadline is April 5, 2022. The DOJ completed its representation process this week, and the undersigned counsel were retained to represent Sabban on March 30, 2022.

Sabban respectfully requests the Court extend his deadline to answer or otherwise respond to Plaintiffs' Original Complaint by 30 days to May 5, 2022. Plaintiffs are not opposed to the relief sought. This extension is not sought for purpose of delay but so that justice may be done.

Respectfully submitted,

**LAW OFFICES OF RANDY T. LEAVITT**

By: /s/ Randy Leavitt

Randy T. Leavitt  
State Bar No. 12098300  
[randy@randyleavitt.com](mailto:randy@randyleavitt.com)  
1301 Rio Grande  
Austin, Texas 78701  
Tel: (512) 476-4475  
Fax: (512) 542-3372

**BUTLER SNOW LLP**

By: /s/ Karson Thompson

Karson Thompson  
State Bar No. 24083966  
[karson.thompson@butlersnow.com](mailto:karson.thompson@butlersnow.com)  
1400 Lavaca Street, Suite 1000  
Austin, Texas 78701  
Tel: (737) 802-1800  
Fax: (737) 802-1801

ATTORNEYS FOR DEFENDANT  
RANI SABBAN

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with counsel for Plaintiffs and Plaintiffs are not opposed to the relief sought in this motion.

/s/ Randy Leavitt  
Randy Leavitt

**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2022, a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Karson Thompson  
Karson Thompson

63788284.v1